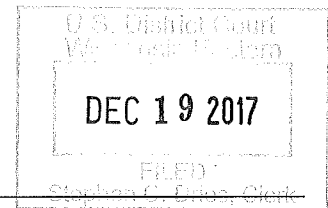


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 17-CR-

17-CR-217

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)
(b)(1)(B), (b)(1)(C), and 846; 18 U.S.C.
§§ 922(g)(1), 924(a)(2),
1956(a)(1)(B)(i), 1956(h), and 2]

CLIFTON MORRISON,
JOSE RODRIGUEZ,
MIGUEL RODRIGUEZ,
LUIS NEVAREZ,
BRENDA Y. VALVERDE,
RONNIE MCFADDEN,
DEWAYNE ALEXANDER, SR.,
FREDERICK PERRY,
DAVID WILDER III,
TOMMIE STEVENS,
GERMAINE D. JOHNSON,
DANIEL S. CARTER,
DON D. WALKER-CRUSE,
RICKY CHRISTOPHER,
DAVID D. COLEMAN,
KELLIN R.L. MORRISON, and
DEWAYNE ALEXANDER, JR.,

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Beginning by at least January 2013, and continuing until on or about December 6, 2017, in the State and Eastern District of Wisconsin and elsewhere,

**CLIFTON MORRISON,
JOSE RODRIGUEZ,
MIGUEL RODRIGUEZ,
LUIS NEVAREZ,
BRENDA Y. VALVERDE,
RONNIE MCFADDEN,
DEWAYNE ALEXANDER, SR.,
FEDERICK PERRY,
TOMMIE STEVENS,
GERMAINE D. JOHNSON, and
RICKY CHRISTOPHER**

knowingly and intentionally conspired with each other, and with persons known and unknown to the grand jury, to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. With respect to defendants Clifton L. Morrison, Jose Rodriguez, Miguel Rodriguez, Luis Nevarez, Brenda Y. Valverde, Ronnie McFadden, and Frederick Perry, the amount involved in the conspiracy attributable to each defendant as a result of his or her own conduct, and the conduct of other co-conspirators reasonably foreseeable to him or her, is one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

3. With respect to defendants Dewayne Alexander, Sr., David Wilder III, Tommie Stevens, and Germaine D. Johnson, the amount involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other co-

conspirators reasonably foreseeable to him, is 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

4. With respect to defendant Ricky Christopher, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other co-conspirators reasonably foreseeable to him, is a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A), (b)(1)(B), and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

From on or about January 2014 through December 6, 2017, in the State and Eastern
District of Wisconsin,

**CLIFTON L. MORRISON,
RICKY CHRISTOPHER,
DAVID COLEMAN, and
DEWAYNE ALEXANDER, JR.**

knowingly combined, conspired, and agreed with each other and with other persons
known and unknown to the grand jury to commit offenses against the United States in
violation of Title 18, United States Code, Section 1956, namely:

- a. To knowingly conduct and attempt to conduct financial transactions
affecting interstate and foreign commerce, which transactions involved the
proceeds of specified unlawful activity, that is, drug trafficking as charged
in Count One, knowing that the transactions were designed in whole or in
part to conceal and disguise the nature, location, source, ownership, and
control of the proceeds of specified unlawful activity, and knowing that the
property involved in the financial transactions represented the proceeds of
some form of unlawful activity, in violation of Title 18, United States
Code, Section 1956(a)(1)(B)(i); and

- b. To knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, drug trafficking as charged in Count One, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under federal law, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS THREE AND FOUR

THE GRAND JURY FURTHER CHARGES:

1. On or about the following dates, in the State and Eastern District of Wisconsin, the identified defendants knowingly and intentionally distributed a controlled substance:

COUNT	DEFENDANT	DATE
3	CLIFTON L. MORRISON DAVID WILDER III	March 30, 2016
4	CLIFTON L. MORRISON DAVID WILDER III	May 4, 2016

2. Each offense involved a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

1. On or about July 14, 2016, in the State and Eastern District of Wisconsin,

**CLIFTON L. MORRISON, and
DAVID WILDER III**

knowingly and intentionally distributed a controlled substance.

2. The offense involved a mixture and substance containing heroin, a
Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

1. On or about December 14, 2016, in the State and Eastern District of Wisconsin,

**CLIFTON L. MORRISON, and
DAVID WILDER III**

knowingly and intentionally distributed a controlled substance.

2. The offense involved a mixture and substance containing fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNTS SEVEN THROUGH NINE

THE GRAND JURY FURTHER CHARGES:

1. On or about the following dates, in the State and Eastern District of Wisconsin, the identified defendants knowingly and intentionally attempted to distribute and to possess with intent to distribute a controlled substance:

COUNT	DEFENDANT	DATE
7	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ FREDERICK PERRY	June 6, 2017
8	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ FREDERICK PERRY	July 28, 2017
9	JOSE RODRIGUEZ CLIFTON L. MORRISON	October 28, 2017

2. Each offense involved a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNTS TEN THROUGH THIRTEEN

THE GRAND JURY FURTHER CHARGES:

1. On or about the following dates, in the State and Eastern District of Wisconsin, the identified defendants knowingly and intentionally attempted to distribute and to possess with intent to distribute a controlled substance:

COUNT	DEFENDANT	DATE
10	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ FREDERICK PERRY	July 8, 2017
11	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ FREDERICK PERRY	July 20, 2017
12	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ FREDERICK PERRY	November 1, 2017
13	JOSE RODRIGUEZ CLIFTON L. MORRISON MIGUEL RODRIGUEZ	November 19, 2017

2. Each offense involved a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNTS FOURTEEN THROUGH TWENTY

THE GRAND JURY FURTHER CHARGES:

1. On or about the following dates, in the State and Eastern District of Wisconsin, the identified defendants knowingly and intentionally attempted to distribute and to possess with intent to distribute a controlled substance:

COUNT	DEFENDANT	DATE
14	DAVID WILDER III	May 12, 2017
15	DANIEL CARTER	June 7, 2017
16	DANIEL CARTER	June 9, 2017
17	DAVID WILDER III	July 7, 2017
18	KELLIN MORRISON	July 28, 2017
19	DAVID COLEMAN	August 7, 2017
20	KELLIN MORRISON	November 7, 2017

2. Each offense involved a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNTS TWENTY-ONE THROUGH TWENTY-TWO

THE GRAND JURY FURTHER CHARGES:

1. On or about the following dates, in the State and Eastern District of Wisconsin, the identified defendant knowingly and intentionally attempted to distribute and to possess with intent to distribute a controlled substance:

COUNT	DEFENDANT	DATE
21	DON D. WALKER-CRUSE	June 8, 2017
22	DON D. WALKER-CRUSE	July 26, 2017

2. Each offense involved a mixture and substance containing heroin, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

**CLIFTON L. MORRISON, and
RONNIE MCFADDEN**

knowingly and intentionally possessed with intent to deliver a controlled substance.

2. The offense involved a mixture and substance containing heroin, a Schedule I controlled substance, respectively.

3. The offense involved 100 grams or more of a mixture containing heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

DEWAYNE ALEXANDER, SR.

knowingly and intentionally possessed with intent to distribute a controlled substance.

2. The offense involved a mixture and substance containing heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

TOMMIE STEVENS

knowingly and intentionally possessed with intent to distribute a controlled substance.

2. The offense involved a mixture and substance containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

DON D. WALKER-CRUSE

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Sig Sauer, model P226, 9mm pistol with an obliterated serial number.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

GERMAINE D. JOHNSON

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Kimber Ultra Carry II .45 caliber semi-automatic pistol, bearing serial number KU99070.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

TOMMIE STEVENS

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Taurus .44 Magnum handgun, bearing serial number DX308810.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

DAVID D. COLEMAN

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Hi-Point 9mm pistol, bearing serial number P1809573.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

RONNIE MCFADDEN

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed four firearms which, prior to his possession of them, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as:
- a. a Taurus, .380 caliber handgun, bearing serial number 97903B;
 - b. a Smith and Wesson 9mm pistol, bearing serial number FXX8798;
 - c. a Jimenez Arms 9mm pistol, bearing serial number 007151; and
 - d. a Norinco SKS 7.62X39 semi-automatic rifle SG Works, bearing serial number 8006264.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES:

1. On or about December 6, 2017, in the State and Eastern District of Wisconsin,

CLIFTON L. MORRISON

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed three firearms which, prior to his possession of them, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as:
- a. a Smith and Wesson .38 caliber revolver, bearing serial number CVT5928;
 - b. a Glock, model 43, pistol, bearing serial number BCML294; and
 - c. a Smith and Wesson .40 caliber pistol, bearing serial number HFZ7903.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE NOTICE

1. Upon conviction of the offenses in violation of Title 21, United States Code, Sections 841 and 846, all property of the defendants constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of the violations set forth in this indictment, and all property of the defendants used, or intended to be used to commit or facilitate the commission of the violations, is subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853. The properties subject to forfeiture include, but are not limited to:

- a. Approximately \$7,483 in United States currency seized from the residence of Clifton Morrison, located at 9XXX N. 70th Street, Milwaukee, WI, on or about December 6, 2017;
- b. Approximately \$15,561 in United States currency seized from the residence of Ronnie McFadden, located at 2XXX N. 41st Street, Milwaukee, WI, on or about December 6, 2017;
- c. Approximately \$2,036 in United States currency seized from the residence of Miguel Rodriguez, located at 3XXXX N. Sheridan Road #7XX, Beach Park, IL, on or about December 6, 2017;
- d. Approximately \$966 in United States currency seized from the residence of Jose Rodriguez, located at 4XXX Ruby Street, Schiller Park, IL, on or about December 6, 2017;
- e. Miscellaneous jewelry, including one diamond earring, one Breitling watch, one Rolex watch, one Gucci watch, and one silver cross with diamonds, seized from the residence of Clifton Morrison, located at 9XXX N. 70th Street, Milwaukee, WI, on or about December 6, 2017;
- f. Miscellaneous jewelry, including one men's gold ring, one men's gold bracelet, and one men's gold necklace, seized from the residence located at 1XX E. National Avenue, #2XX, Milwaukee, WI, on or about December 6, 2017;

- g. A Sig Sauer, model P226, 9mm pistol with an obliterated serial number and eight rounds of ammunition seized from the residence located at 6XXX W. Moltke Avenue, Milwaukee, WI, on or about December 6, 2017;
- h. A Glock, model 19C, 9mm pistol, bearing serial number GAV468, and eight rounds of ammunition seized from the residence located at 4XXX Ruby Street, Schiller Park, IL, on or about December 6, 2017;
- i. A Raven Arms .25 caliber pistol, bearing serial number 131718, seized from the residence located at 4XXX Ruby Street, Schiller Park, IL, on or about December 6, 2017;
- j. A Kimber Ultra Carry II .45 caliber firearm, bearing serial number KU99070, and eight rounds of ammunition, seized from the residence of 1XX E. National Avenue, #2XX, Milwaukee, WI, on or about December 6, 2017;
- k. Two .45 caliber magazines and multiple rounds of .45 caliber ammunition seized from the residence of 1XX E. National Avenue, #2XX, Milwaukee, WI, on or about December 6, 2017;
- l. A Taurus .44 caliber firearm, bearing serial number DX308810, and six rounds of ammunition seized from the residence located 2XXX N. 2nd Street, Milwaukee, WI, on or about December 6, 2017;
- m. A Taurus .380 caliber firearm, bearing serial number 97903B, and six rounds of ammunition seized from the residence of 2XXX N. 41st Street, Milwaukee, WI, on or about December 6, 2017;
- n. A Smith and Wesson 9mm pistol, bearing serial number FXX8798, and fourteen rounds of ammunition seized from the residence of 2XXX N. 41st Street, Milwaukee, WI, on or about December 6, 2017;
- o. A Jimenez Arms 9mm pistol, bearing serial number 007151, and twenty-four rounds of ammunition seized from the residence of 2XXX N. 41st Street, Milwaukee, WI, on or about December 6, 2017;
- p. A Norinco SKS 7.62x39 semi-automatic rifle SG Works, bearing serial number 8006264, seized from the residence of 2XXX N. 41st Street, Milwaukee, WI, on or about December 6, 2017;

- q. A Smith and Wesson .38 caliber revolver, bearing serial number CVT5928, and five rounds of ammunition seized from the residence of 9XXX N. 70th Street, Milwaukee, WI, on or about December 6, 2017;
- r. A Glock, model 43, pistol, bearing serial number BCML294, and seven rounds of ammunition seized from the residence of 9XXX N. 70th Street, Milwaukee, WI, on or about December 6, 2017;
- s. A Smith and Wesson .40 caliber pistol, bearing serial number HFZ7903, and thirteen rounds of ammunition seized from the residence of 9XXX N. 70th Street, Milwaukee, WI, on or about December 6, 2017;
- t. A Desert Eagle .40 caliber handgun, bearing serial number 105291, and six rounds of ammunition seized from the residence of 8XXX W. Center Street, Milwaukee, WI, on or about December 6, 2017;
- u. A Remington, model Woodmaster 742, 30-06 rifle, bearing serial number B7458932, and eleven rounds of ammunition seized the residence of 8XXX W. Center Street, Milwaukee, WI, on or about December 6, 2017;
- v. A Phoenix Arms, model HP22A, .22 caliber handgun, bearing serial number 4273861 and twelve rounds of ammunition seized from the residence located at 4XXX N. 52nd Street, Milwaukee, WI, on or about December 6, 2017;
- w. A Smith and Wesson, model 9 Shield, 9mm pistol, bearing serial number HPY1224, and eight rounds of ammunition seized from the residence located at 4XXX N. 52nd Street, Milwaukee, WI, on or about December 6, 2017;
- x. An Anderson Manufacturing AM-15 rifle, bearing serial number 16201246, and thirty rounds of ammunition seized from the residence located at 4XXX N. 52nd Street, Milwaukee, WI, on or about December 6, 2017;
- y. A Glock 9mm pistol bearing serial number BAGR182, and sixteen rounds of ammunition seized from the residence located at 3XXX W. Kilbourn Avenue, Milwaukee, WI, on or about December 6, 2017;
- z. A Glock .40 caliber pistol, bearing serial number MYX963, and fifteen rounds of ammunition seized from the residence located at 4XXX N. 52nd Street, Milwaukee, WI, on or about December 6, 2017; and

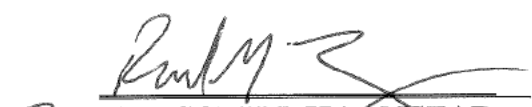
aa. A Hi-Point 9mm pistol, bearing serial number P1809573, seized on or about December 6, 2017.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON

Dated: 12-19-17


GREGORY J. HAANSTAD
United States Attorney